

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DAVID CHOI, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff,

v.

COUPANG, INC., BOM SUK KIM, GAURAV
ANAND, MICHAEL PARKER, MATTHEW
CHRISTENSEN, LYDIA JETT, NEIL
MEHTA, BENJAMIN SUN, KEVIN WARSH,
HARRY YOU, GOLDMAN SACHS & CO.
LLC, ALLEN & COMPANY LLC, and J.P.
MORGAN SECURITIES LLC,

Defendants.

Case No. 1:22-cv-07309-VSB

DECLARATION OF JEREMY A.
LIEBERMAN IN SUPPORT OF MOTION
OF THE NEW YORK CITY PUBLIC
PENSION FUNDS FOR
CONSOLIDATION, APPOINTMENT AS
LEAD PLAINTIFF AND APPROVAL OF
LEAD COUNSEL

NAYA 1740 FUND LTD., NAYA
COLDWATER FUND, NAYA MASTER
FUND LP, NAYAWOOD LP, and
QUANTUM PARTNERS LP, Individually and
on Behalf of All Others Similarly Situated,

Plaintiff,

v.

COUPANG, INC., BOM SUK KIM, GAURAV
ANAND, MICHAEL PARKER, MATTHEW
CHRISTENSEN, LYDIA JETT, NEIL
MEHTA, BENJAMIN SUN, KEVIN WARSH,
HARRY YOU, GOLDMAN SACHS & CO.
LLC, ALLEN & COMPANY LLC, J.P.
MORGAN SECURITIES LLC, CITIGROUP
GLOBAL MARKETS INC., HSBC
SECURITIES (USA), INC., DEUTSCHE
BANK SECURITIES INC., UBS SECURITIES
LLC, MIZUHO SECURITIES USA LLC, and
CLSA LIMITED,

Defendants.

Case No. 1:22-cv-08756-VSB

I, Jeremy A. Lieberman, hereby declare as follows:

1. I am the Managing Partner of Pomerantz LLP (“Pomerantz”), counsel on behalf of the New York City Public Pension Funds (the “NYC Funds”)¹, and have personal knowledge of the facts set forth herein. I make this Declaration in support of the NYC Funds’ motion for consolidation of the above-captioned actions, appointment as Lead Plaintiff for the Class in the consolidated action and approval of the NYC Funds’ selection of Pomerantz as Lead Counsel for the Class.

2. Attached hereto as the exhibits indicated are true and correct copies of the following:

- Exhibit A: Chart setting forth the NYC Funds’ financial interest in this litigation;
- Exhibit B: Press release published over *Business Wire* on August 26, 2022, announcing the pendency of the above-captioned action *Choi v. Coupang, Inc. et al.*, 1:22-cv-07309-VSB;
- Exhibit C: Shareholder Certifications executed on behalf of the NYC Funds; and
- Exhibit D: Firm resume of Pomerantz.

I declare under penalty of perjury under the laws of the United States of America that the foregoing facts are true and correct.

Executed on October 25, 2022.

/s/ Jeremy A. Lieberman
Jeremy A. Lieberman

¹ For purposes of this motion, the “NYC Funds” are the Teachers’ Retirement System of the City of New York, the New York City Employees Retirement System, the New York City Police Pension Fund, the New York City Fire Department Pension Fund, the Board of Education Retirement System of the City of New York, the New York City Deferred Compensation Plan, and the Teachers’ Retirement System of the City of New York Variable Annuity Program.